

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff,

v.

CIVIL NO. 12-2039 (FAB)

COMMONWEALTH OF PUERTO RICO, et  
al.,

Defendants.

**Informative Motion Supplementing the Recommendation  
of an Auditor by the Special Master**

NOW COMES Special Master Dr. Alejandro del Carmen providing additional information regarding his recommendation of Christopher Graham, CPA, CFE made in response to the order of the Court at Docket No. 2154.

To further inform the Court regarding the prospective retention of Mr. Graham to conduct the audit of the 109 expenditures previously identified as questionable in the Office of the Special Master (OSM) review of the Police Reform budgets for Fiscal Years 2019, 2020 and 2021, the OSM requested an estimated scope of work and rough cost estimate from Mr. Graham for the audit. Mr. Graham provided the following:

The scope of the audit would include:

1. Determine if the questionable expenses were approved by proper authorities prior to the commitment of Commonwealth funds. Review accompanying documentation.
2. Reconcile dates of commitment/expense with dates reported by the Commonwealth.
3. Confirm listed expenses are supported by documentation of actual payment(s).
4. To the extent available, review documentation supporting the actual receipt of purchased items, including inventory recordation, completed contracts, etc.

5. Review and comment on the applicability of purchased items or services to support the required elements in the Police Reform Case.

6. Prepare the final report of noted findings, deficiencies, and responsiveness to audit requests.

The following is a rough cost estimate based on the assumption that all requested documentation exists, and the Commonwealth will provide responses within reasonable timeframes, billed at \$150 per hour.

- Background review of the consent decree, applicable court filings, monitor reports, and budget reports - 10 hours: \$1500
- Convert PDF spreadsheet reports to machine-readable format in Excel and conduct mathematical reconciliations - 5 hours: \$750
- Compile and organize provided documents - 2 hours: \$300
- Examination and audit of individual expense documents- 80 hours: \$12,000
- Site visit/meetings - 16 hours: \$2400
- Preparation of audit report - 4 hours: \$600

Total direct labor estimate: \$17,550

The Special Master certifies that the foregoing document was electronically filed with the Clerk of the Court for the District of Puerto Rico, using the CM/ ECF system which will send a copy and notification of filing to the Monitor and all counsel of record.

**RESPECTFULLY SUBMITTED** this 11<sup>th</sup> day of September 2022,

**ALEJANDRO DEL CARMEN**

Special Master

s/Alejandro del Carmen

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